

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

~~SEALED INFORMATION~~ JL

- v. - :

13 Cr.

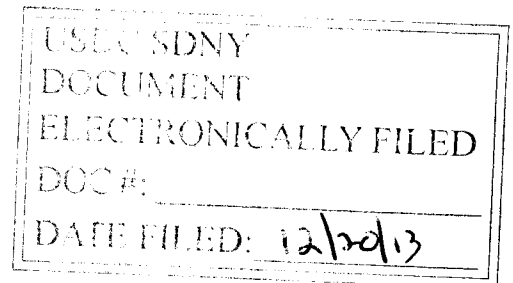
ANTHONY RUSSELL, :
a/k/a "Ant," :

13 CRIM997

Defendant. :

- - - - - x

COUNT ONE



The United States Attorney charges:

1. From in or about July 2013 through in or about September 2013, in the Southern District of New York and elsewhere, ANTHONY RUSSELL, a/k/a "Ant," the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit offenses against the United States, to wit, violations of Title 18, United States Code, Section 922(a)(1)(A).

2. It was a part and an object of the conspiracy that, from in or about July 2013 through in or about September 2013, ANTHONY RUSSELL, a/k/a "Ant," the defendant, and others known and unknown, not being licensed importers, licensed manufacturers, or licensed dealers of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly would and did engage in the business of dealing in firearms, and

JUDGE DANIELS

in the course of such business did ship, transport, and receive firearms in interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(a)(1)(A).

Overt Act

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt act, among others, was committed in the Southern District of New York and elsewhere:

a. On or about September 19, 2013, ANTHONY RUSSELL, a/k/a "Ant," the defendant, sold a number of firearms, which had previously been shipped and transported in interstate commerce, to an undercover law enforcement officer in the vicinity of 116th Street and Pleasant Avenue in New York, New York.

(Title 18, United States Code, Section 371.)

COUNT TWO

The United States Attorney further charges:

4. On or about July 12, 2013, in the Southern District of New York, ANTHONY RUSSELL, a/k/a "Ant," the defendant, not being a licensed importer, licensed manufacturer, or licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly did engage in the business of dealing in firearms, and in the course of such business did ship, transport, and receive firearms in interstate and foreign commerce, to wit, RUSSELL participated in the sale of a number

of firearms, which had previously been shipped and transported in interstate commerce, to an undercover law enforcement officer in the vicinity of 116th Street and Pleasant Avenue in New York, New York.

(Title 18, United States Code, Sections 922(a)(1)(A) and 2.)

COUNT THREE

The United States Attorney further charges:

5. On or about August 14, 2013, in the Southern District of New York, ANTHONY RUSSELL, a/k/a "Ant," the defendant, not being a licensed importer, licensed manufacturer, or licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly did engage in the business of dealing in firearms, and in the course of such business did ship, transport, and receive firearms in interstate and foreign commerce, to wit, RUSSELL participated in the sale of a number of firearms, which had previously been shipped and transported in interstate commerce, to an undercover law enforcement officer in the vicinity of 116th Street and Pleasant Avenue in New York, New York.

(Title 18, United States Code, Sections 922(a)(1)(A) and 2.)

COUNT FOUR

The United States Attorney further charges:

6. On or about September 19, 2013, in the Southern District of New York, ANTHONY RUSSELL, a/k/a "Ant," the defendant, not being a licensed importer, licensed manufacturer, or licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly did engage in the business of dealing in firearms, and in the course of such business did ship, transport, and receive firearms in interstate and foreign commerce, to wit, RUSSELL participated in the sale of a number of firearms, which had previously been shipped and transported in interstate commerce, to an undercover law enforcement officer in the vicinity of 116th Street and Pleasant Avenue in New York, New York.

(Title 18, United States Code, Sections 922(a)(1)(A) and 2.)

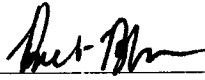
COUNT FIVE

The United States Attorney further charges:

7. From in or about July 2013 through in or about September 2013, in the Southern District of New York and elsewhere, ANTHONY RUSSELL, a/k/a "Ant," the defendant, having been convicted in a court of a crime punishable by imprisonment for a term exceeding one year, knowingly did possess in and affecting commerce firearms, to wit, RUSSELL sold a number of

firearms that had previously been shipped and transported in interstate and foreign commerce, to an undercover law enforcement officer in New York, New York.

(Title 18, United States Code, Sections 922(g)(1).)

A handwritten signature in black ink, appearing to read "Preet Bharara", is positioned above a horizontal line.

PREET BHARARA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

ANTHONY RUSSELL,
a/k/a "Ant,"

Defendant.

INFORMATION

13 Cr.

(Title 18, United States Code, Sections 371,
922(a)(1)(A), 922(g)(1) and 2.)

PREET BHARARA
United States Attorney.

12/20/13 DEFT RUSSELL PRESENTED w/ATTY S. MATHIAS
PUSA JAMES CEMIL
DEFT WAIVED INDICTMENT AND PLEAS NOT GUILTY
DETAINED